

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

PAUL R. CONFORTI,

Plaintiff,

CASE NO. 20-CV-349

HUMANA CARESOURCE,
ABC INSURANCE COMPANY,

Involuntary Plaintiffs,

v.

CITY OF FRANKLIN,
OFFICER CHRISTOPHER RYDELSKI,
OFFICE GARY WALLACE,
LEAGUE OF WISCONSIN MUNICIPALITIES
MUTUAL INSURANCE,

Defendants.

AFFIDAVIT OF REMZY D. BITAR

STATE OF WISCONSIN :
: ss
WAUKESHA COUNTY :

REMZY D. BITAR, being first duly sworn on oath, deposes and states as follows:

1. I am an adult resident of the State of Wisconsin and make this Affidavit on personal information and belief.

2. I am one of the attorneys representing City of Franklin, Officer Christopher Rydelski, Officer Gary Wallace and League of Wisconsin Municipalities Mutual Insurance (“Defendants”) in the above-captioned matter and I make this declaration in support of the Notice of Removal.

3. Plaintiff filed the Summons and Complaint against the Defendants in Milwaukee County Circuit Court on January 28, 2020. A true and correct copy of the Complaint is attached hereto as Exhibit A.

4. On today's date, the Defendants filed their Answer and Affirmative Defenses in the Circuit Court of Milwaukee County, Wisconsin, and served all parties who appeared in Case No. 20-CV-758. A true and correct copy of the Answer and Affirmative Defenses is attached hereto as Exhibit B.

5. All Defendants have consented to removal.

Pursuant to 28 U.S.C. Sec. 1746 I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on the 3rd day of March, 2020.

BY: s/ Remzy D. Bitar
REMZY D. BITAR